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5 *Attorneys for Defendant Cooper Tire*
6 *& Rubber Company LLC*

7 **IN THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 OSMAN ESTIBI AGUILAR, an Individual,
10
11 Plaintiff,

12 vs.

13 HERCULES TIRE & RUBBER COMPANY
INC., a foreign corporation, dba IRONMAN
14 TIRE; THE GOODYEAR TIRE & RUBBER
COMPANY, INC., a foreign corporation;
15 COOPER TIRE HOLDING COMPANY
INC., a foreign corporation; COOPER TIRE
16 & RUBBER COMPANY LLC, a foreign
limited liability company, SILVER LAKE
17 CONSTRUCTION LLC, a foreign limited
liability company; ROE TIRE
18 MANUFACTURER I through X; ROE TIRE
DISTRIBUTOR I through X; ROE TIRE
19 INSTALLATION COMPANY I through X;
ROE COMPANY I through X; DOES I
20 through X; and ROE CORPORATIONS I
through X, inclusive,
21
22

23 Defendants.

CASE NO.: 2:24-cv-00359-GMN-MDC

**DEFENDANT COOPER TIRE &
RUBBER COMPANY LLC'S MOTION
TO EXTEND THE TIME FOR FILING
THE JOINT STATUS REPORT**

24
25 **TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR**
26 **THE DISTRICT OF NEVADA:**

27 Defendant, Cooper Tire & Rubber Company LLC, by and through its undersigned counsel
28 of record, and moves this honorable Court for an Order extending the Joint Status Report currently

1 due March 22, 2024 to April 19, 2024.

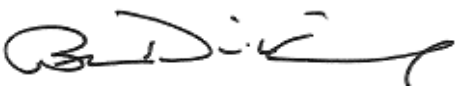
2 On March 13, 2024, the Court granted Joshua P. Berrett, Esq., and David Finegold, Esq of
3 Bighorn Law's Motion to Withdraw as counsel of record for the Plaintiff. The Court has set April
4 12, 2024, as the date by which the Plaintiff must advise the court whether he has new counsel or
5 will be proceeding without counsel.
6

7 On Friday, March 22, 2024, the Joint Status Report is due for filing with the Court. Given
8 that the Plaintiff may be retaining new counsel, Defendant respectfully requests that the due date
9 for the Joint Status Report be extended to April 19, 2024. This will allow the Plaintiff time to retain
10 counsel. This will also avoid any communication between the Defendant's counsel and the Plaintiff,
11 thereby protecting any attorney client communications Mr. Aguilar may have with prospective
12 counsel.
13

14 For the above reasons, undersigned counsel respectfully requests the Joint Status Report
15 deadline be extended to April 19, 2024.

16 Dated this 19th day of March, 2024

THORNDAL ARMSTRONG, PC

18
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By:

BRUCE SCOTT DICKINSON, ESQ.

Nevada Bar No. 002297

600 S. Las Vegas Blvd., Suite 400

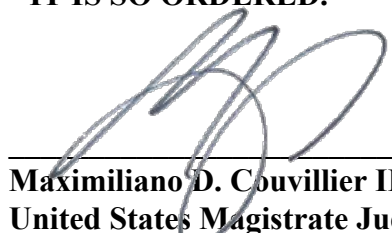
Las Vegas, NV 89101

Tel: (702) 366-0622 / Fax: (702) 366-0327

23 **ORDER**

24 **IT IS SO ORDERED.**

Attorney for Cooper Tire & Rubber
Company LLC

25
26 
27 **Maximiliano D. Couvillier III**
28 **United States Magistrate Judge**
Date: March 25, 2024

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that I am an employee of THORNDAL ARMSTRON, PC and that on this 19th day of March, 2024, I caused to be served a copy of the foregoing **DEFENDANT COOPER TIRE & RUBBER COMPANY LLC'S MOTION TO EXTEND THE TIME FOR FILING THE JOINT STATUS REPORT**, as follows:

_____ Electronic Service pursuant to NECFR 9.

X

_____ Placing an original or true copy in a sealed envelope place for collection and mailing in the United States Mail, at Las Vegas, Nevada, postage prepaid, following ordinary business practices.

_____ Facsimile transmission only.

_____ Case Management/Electronic Case Filing (CM/ECF).

_____ Hand Delivery – Receipt of Copy.

_____ Via Email:

Osman Aguilar
580 Morgan Ln
Pahrump, NV 89060

Plaintiff, Pro Se

/s/ *Star Farrow-Pleumarz*

Employee of THORNDAL ARMSTRONG, PC